

**\*FILED UNDER SEAL\***

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

## **EXHIBIT 36**

**PLAINTIFF STATES' OPENING BRIEF TO THE SPECIAL MASTER  
FOR THE FEBRUARY 22, 2024 HEARING**

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**From:** SVENSON, Ross <Ross.Svenson@freshfields.com>  
**Sent:** Friday, December 8, 2023 3:41 PM  
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**Cc:** SESSIONS, Justina (JKS); MCCALLUM, Robert; BRANDON, Eric; dpearl@axinn.com; Sherman, Sam D.; Korologos, Philip; 'Serina Vash'; 'Jordan Elias'; Mao, Mark; Earnhardt, Izaak; 'Goodnow, Christopher C.'; Lv, Kate; Thorne, John; 'Stuart Davidson'; 'Ted Maya'; 'Eric Maier'; Henningson, Sven E. (Trip); ccoslett@bm.net; GZelcs@KoreinTillery.com; 'Zeke DeRose'; 'Trevor Young'; Geraldine W. Young  
**Subject:** Google's Proposal re MDL Plaintiffs' RFP No. 305

**[External Email – Use Caution]**

Hi Walter,

As discussed on our call this morning, our proposal with respect to MDL Plaintiffs' RFP No. 305 is as follows:

In satisfaction of RFP No. 305, Google will produce the trial testimony (and related exhibits) of the seven Search witnesses who are also Ad Tech custodians in unredacted form, except to the extent it contains third-party confidential information. Third-party confidential information will remain redacted pursuant to the Search trial protective order.

The seven Search witnesses who are also Ad Tech custodians are:

- Adam Juda
- Hal Varian
- Jerry Dischler
- Joan Braddi
- Prabhakar Raghavan
- Sridhar Ramaswamy
- Sundar Pichai

The public docket for the Search case has the names of all the trial witnesses, and these are the seven overlapping Search witnesses / Ad Tech custodians that we identified.

We look forward to your response.

Kind regards,  
Ross

**Ross Svenson**

Associate  
He/Him

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